



**Fisheries and Oceans Canada**      **Pêches et Océans Canada**

**Ecosystem Management**

**Fisheries and Oceans Canada / Pêches et Océans Canada**  
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Dartmouth, Nova Scotia, B2Y 4A2

August 1, 2014

*Your file*      *Votre référence*

*Our file*      *Notre référence*  
**06-HMAR-MA7-00182**

**David Birkett**  
**AltaGas Natural Gas Storage Ltd.**  
**1700, 355 4<sup>th</sup> Ave. SW**  
**Calgary, Alberta T2P 0J1**

Dear Mr. Birkett:

**Subject: Review of Alton Natural Gas Estuary Monitoring Plan – condition of the  
Nova Scotia Environmental Assessment and Fisheries and Oceans  
Canada**

The Fisheries Protection Program (The program) of Fisheries and Oceans Canada (DFO) received the proposed Alton Gas Estuary Monitoring Plan on June 18, 2014.

Our review consisted of:

- Alton Natural Gas Estuary Monitoring Plan submitted by the consultant, Mr. Bob Rutherford, Thaumus Environmental Consultants Ltd. on June 18, 2014.
- DFO letter of advice drafted by Melanie McLean, Habitat Assessment Biologist and submitted to AltaGas Natural Gas Storage Ltd. (formerly Alton Natural Gas Storage LP- the proponent) on November 5, 2010.
- Nova Scotia (NS) Environment Assessment Supplemental Information Application to develop natural gas storage caverns in Shubenacadie, NS by the proponent, received on November 23, 2007.

DFO participated in the Nova Scotia Environmental Assessment of the proposal submitted by the proponent to develop natural gas storage caverns in 2007. Condition 2.1 of the NS Environmental Assessment Approval dated December 18, 2007, stipulated the proponent was to provide monitoring programs and plans to the Nova Scotia Environment (NSE) and DFO for review. Also, based on the outcome of the monitoring program, the proponent was to make modifications to the mitigation plans and/or operations to prevent any unacceptable environmental effects.

Monitoring programs A, C and D, listed in Attachment 1 were developed between DFO and the proponent and were administered from 2008 to 2013. The purpose of this proposed plan titled: 'Alton Natural Gas Estuary Monitoring Plan' [herein referred to as the Monitoring Plan] submitted on June 18, 2014 was to take the results from the monitoring programs and make modifications to mitigation plans and/ or operations to

**Canada**

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prevent continuing unacceptable environmental effects to the satisfaction of NSE and DFO. The plan was also developed to satisfy conditions, B and E of Attachment 1.

Upon review of the proposed Monitoring Plan, it is recommended a study be completed to determine the median toxicity threshold ( $LC_{50}$ ) of the brine water and its constituents from the brining operation on egg, larvae and juvenile Stripped bass survival. Based on the results of this toxicity study, modifications to the mitigation measures may be required.

The results of the toxicity study, including possible additional mitigation measures, and design revisions are to be implemented as per the Monitoring Plan and should be provided to DFO for review once available.

If the proponent has any questions, please contact Carol Jacobi at our Dartmouth, NS office at (902) 426-2545, by fax at (902) 426-1489, or by email at [Carol.Jacobi@dfo-mpo.gc.ca](mailto:Carol.Jacobi@dfo-mpo.gc.ca). Please refer to the file number referenced above when corresponding with the Program.

Yours sincerely,



Mark McLean  
A/ Manager, Regulatory Reviews  
Fisheries Protection Program

**COPY LIST:** Helen MacPhail, Nova Scotia Environment  
Carol Jacobi, FPP